

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

**TODD HEBERT**

**VS.**

**ER SENIOR MANAGEMENT AND  
OPCO ML LLC DBA MEADOW LAKE  
SENIOR LIVING COMMUNITY**

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**CIVIL ACTION NO.  
6:21-cv-00030  
JURY**

**STIPULATION OF DISMISSAL OF DEFENDANTS**

Plaintiff Todd Hebert and Defendants ER Senior Management and OPCO ML LLC d/b/a Meadow Lake Senior Living Community file this Stipulation of Dismissal pursuant to FEDERAL RULES OF CIVIL PROCEDURE 41.

1. Plaintiff filed suit against Defendant alleging violations of the Americans with Disabilities Act and Family Medical Leave Act, and breach of contract.
2. Plaintiff and Defendants have reached a settlement. Plaintiff now moves to dismiss his claims against Defendants.
3. This case is not a class action nor has a receiver been appointed.
4. None of the Parties have dismissed a prior action based on or including the same claims presented in this suit.
5. Plaintiff's dismissal is with prejudice. Each party has agreed to pay their own litigation costs, including but not limited to attorneys' fees.

Dated: September 23, 2021.

**Respectfully submitted,**

By: /s/ Stacy Hoffman Bruce

**STACY HOFFMAN BRUCE**

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**ATTORNEYS FOR DEFENDANT**

**-and-**

By: /s/ William S. Hommel, Jr.

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